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8 Attorneys for Defendants
BLOCK, INC. and CASH APP INVESTING, LLC

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 MICHELLE SALINAS and RAYMEL
13 WASHINGTON, individually and on behalf of
all others similarly situated,

14 Plaintiffs,

15 v.

16 BLOCK, INC. and CASH APP INVESTING,
17 LLC,

18 Defendants.
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Case No. 3:22-cv-04823-JSC

**DECLARATION OF ARAVIND
SWAMINATHAN IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED PURSUANT
TO CIVIL L.R. 3-12 AND 7-11**

1 I, Aravind Swaminathan, declare as follows:

2 1. I am a partner with the law firm Orrick, Herrington & Sutcliffe LLP, counsel for
3 Defendants Block, Inc. and Cash App Investing, LLC. I make this declaration in support of
4 Defendants' Administrative Motion to Consider Whether Cases Should Be Related. I have personal
5 knowledge of the facts stated herein and, if called as a witness, would competently testify thereto.

6 2. I have reviewed the complaints in *Gordon v. Block, Inc. et al.*, Case No. 22-cv-
7 06787-YGR (N.D. Cal.), and *Salinas, et al. v. Block, Inc., et al.*, No. 22-cv-04823-JSC, (N.D. Cal.)
8 and I believe the actions concern substantially the same parties and event and it appears likely that
9 there will be an unduly burdensome duplication of labor and expense and risk of conflicting results
10 if the cases are conducted before different Judges.

11 3. A stipulation pursuant to Civil Local Rule 7-11(a) could not be obtained with all
12 parties. I informed counsel for Plaintiffs Salinas and Washington in the *Salinas* case and counsel
13 for Plaintiff Gordon in the *Gordon* case that Defendants believe the cases should be related.
14 Counsel in both matters expressed disagreement and a belief that the cases should be kept separate.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct.

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18 Executed this 28th day of November 2022 at Seattle, Washington.

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20 By: /s/ Aravind Swaminathan

21 ARAVIND SWAMINATHAN
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